

# Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

DEVAL L. PATRICK Governor MAEVE VALLELY BARTLETT
Secretary

DAVID W. CASH Commissioner

December 5, 2014

Ms. Tracy Markham Site Manager Southbridge Recycling and Disposal Park 165 Barefoot Road Southbridge, MA 01550

**RE:** SOUTHBRIDGE

Transmittal No.: X262787 Application No.: CE-14-021

Class: OP FMF No.: 39743

AIR QUALITY PLAN APPROVAL

Dear Ms. Markham:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your Limited Plan Application ("Application") listed above. This Application concerns the proposed construction and operation of an enclosed flare at the Southbridge Landfill facility located at 165 Barefoot Road in Southbridge, Massachusetts ("Facility").

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control" regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-N, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

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## 1. DESCRIPTION OF FACILITY AND APPLICATION

#### A. HISTORY

On August 18, 1981, MassDEP issued the first solid waste disposal permit for the Facility. Since then, MassDEP has issued various other solid waste permits dealing with construction details, types and amounts of wastes received, etc.

On February 6, 2006, MassDEP issued Plan Approval Transmittal No. W068501 for installation of a landfill gas treatment system, two engine generator sets, and an open flare to burn the treated landfill gas. On December 3, 2010, MassDEP issued an amendment to Plan Approval Transmittal No. W068501 which authorized the installation of a single engine instead of two engines. On July 26, 2012, MassDEP issued a second amendment to clarify the requirements for hydrogen sulfide removal in the landfill gas treatment system. On September 3, 2014, MassDEP received the present Application Transmittal No. X262787 for a new enclosed flare to provide increased capacity to burn landfill gas.

#### **B. FACILITY DESCRIPTION**

The deposited waste in the landfill naturally breaks down and, in the process, generates landfill gas ("LFG"). The LFG consists of approximately 40-50 percent methane, with a balance of mainly carbon dioxide, along with trace gases which include oxygen, nitrogen, hydrogen sulfide, and organic compounds. The LFG is collected in various wells throughout the landfill and is piped to a common header leading to the LFG treatment system.

In the LFG treatment system, LFG flows through a knockout pot to remove condensate and then through metal boxes containing "Sulfa Treat" media. The Permittee currently uses four boxes of media to treat the LFG. The boxes are set up in parallel pairs which allow the LFG to flow through the media in a variety of configurations. The connection piping system contains flow control valves to allow regulating the flow of LFG through the different boxes for optimum treatment. The Sulfa Treat media is made of loose pieces of clay-based substrate coated with iron oxide; the iron oxide reacts with hydrogen sulfide in the LFG to form iron sulfide. Removal of the hydrogen sulfide reduces sulfur dioxide emissions from downstream combustion of the LFG. The Sulfa Treat media is replaced when it is no longer able to reduce the hydrogen sulfide to the required level of 200 parts per million.

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The LFG next flows through another knockout pot and then a compressor which serves to pull the vacuum required for LFG to flow through the collection system. After the compressor, the LFG flows to the following LFG combustion/destruction devices:

- 1. A Caterpillar Model G3520C engine generator set, which burns a portion of the LFG and generates electricity for use in the Facility and for sale to the grid. This engine generator set is designated as Emission Unit ["EU"] No.1 and is rated at 1,600 kilowatts.
- 2. An open flare, designated as EU No.3, which burns the remainder of the LFG that is not burned in the engine.

#### C. PROJECT DESCRIPTION

The approved project consists of the installation of a new Parnel enclosed flare to burn LFG. It will be designated as EU No.2. The enclosed flare will provide higher combustion efficiency than the existing open flare, allowing for lower potential emissions. The enclosed flare is 45 feet tall with a 9-foot diameter. The enclosed flare is designed to have a minimum retention time of 0.7 seconds at 1625° Fahrenheit, while operating at the maximum design flow rate of 2200 standard cubic feet per minute of LFG.

#### D. APPLICABLE REQUIREMENTS

- 1. Federal Requirements: The Permittee is subject to the following requirements:
  - a. 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills:
  - b. 40 CFR 60 Subpart JJJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines;
  - c. 40 CFR 60.18(b), Standards of Performance for Flares;
  - d. 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
- 2. State Requirements: The Permittee is subject to 310 CMR 7.02(8) Best Available Control Technology ("BACT"). MassDEP has determined that BACT for this application is the installation of the enclosed flare with a minimum destruction efficiency of 98.9 percent by weight of total Non-Methane Organic Compounds ("NMOC") contained in the LFG.

This Plan Approval Transmittal No. X262787 replaces and supersedes Plan Approval Transmittal No. W068501 and its amendments Nos. W068501-A1 and W068501-A2. The underlying application materials remain applicable where not superseded by this Plan Approval.

## 3. <u>EMISSION UNIT IDENTIFICATION</u>

Each Emission Unit ("EU") identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1				
EU Description Description		Design Capacity	Pollution Control Device (PCD)	
1	Caterpillar Engine G3520C LE	1,600 kW	None	
2	Enclosed Flare: Parnel Biogas Inc. Model No.: Skid Mounted 9 x 45	2,200 scfm <sup>1</sup>	None	
3	Open Flare: Landfill Gas Specialties, L.L.C. Model No.: CF825I6	1,350 scfm <sup>1</sup>	None	
4	Emergency Generator No. 1 Caterpillar Model No.: Multi-Quip 85	75 kW	None	
5	Emergency Generator No. 2 Olympian Model No.: D40P1	40 kW	None	
6	Emergency Generator No. 3 Caterpillar Model No.: XQ300	300 kW	None	

#### **Table 1 Notes**

1. Landfill gas flow in units of standard cubic feet per minute is based on 50 percent methane.

### Table 1 Key:

EU = Emission Unit NumberkW = Kilowatts PCD = Pollution Control Device scfm = Standard Cubic Feet per Minute

## 4. <u>APPLICABLE REQUIREMENTS</u>

## A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2:

Table 2					
	Operational /	A: C 4 : 4	E	Emission Limit	
EU	Production Limit		Lb/MMBtu	Lb/hr	TPY
		PM	0.002	0.23	1
		NOx	0.163	2.51	11
1		СО	0.846	11.87	52
1		SO <sub>2</sub> <sup>1</sup>	0.07	1.14	5
		NMOC	0.114	2.05	9
		VOC	0.114	2.05	9
		PM	0.017	0.71	3.1
		NOx	0.06	2.5	11
2		CO	0.20	8.22	36
2		SO <sub>2</sub> <sup>1</sup>	0.07	2.9	13
		NMOC	0.01	0.41	2
		VOC	0.01	0.41	2
		PM	0.017	0.2	1
		NOx	0.04	0.45	2
3		СО	0.75	8.42	37
3		SO <sub>2</sub> <sup>1</sup>	0.07	0.8	3.5
		NMOC	0.01	0.09	0.4
		VOC	0.01	0.09	0.4
		PM	4.1 TPY 21.8 TPY 88.0 TPY		
		NOx			
		СО			
Facility-		SO <sub>2</sub> <sup>1</sup>	17.6TPY 10.8 TPY		
wide		NMOC			
		VOC	Stack emissions shall not exceed 0% opacity (visible emissions) with the exception of up to five (5) minutes during startup.		
		Opacity			eption of up to

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#### **Table 2 Notes**

The H<sub>2</sub>S concentration limit of 200 ppmv shall be determined as a calendar monthly average of 200 ppmv with a
maximum limit of 500 ppmv. The Sulfa Treat shall reduce LFG H<sub>2</sub>S concentration to a monthly average of 200 ppmv
in LFG at 50 percent methane prior to combustion in the engine and flares.

PM = Total Particulate Matter

NO<sub>x</sub> = Nitrogen Oxides CO = Carbon Monoxide

#### Table 2 Key:

% = percent

 $EU = Emission\ Unit\ Number$   $Lb/hr = Pounds\ per\ Hour$   $TPY = tons\ per\ consecutive 12-month\ period$   $ppmv = parts\ per\ million\ dry\ volume$   $H_2S = hydrogen\ sulfide$   $LFG = landfill\ gas$ 

 $SO_2$  = Sulfur Dioxide VOC = Volatile Organic Compounds NMOC = Non Methane Organic Compounds Lb/MMBtu = Pounds per million British thermal units

### B. <u>COMPLIANCE DEMONSTRATION</u>

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5:

Table 3				
EU	Monitoring and Testing Requirements			
	The engine shall be continuously monitored for run time and kilowatt-hours produced.			
1	<ol> <li>The Permittee shall maintain an operable oxygen analyzer on-site and monitor the engine exhaust oxygen levels at least once per week or, as an alternative, monitor and record the turbocharger outlet or boost pressure.</li> </ol>			
	3. The Facility generator set shall accommodate the emission testing requirements contained in 40 CFR Part 60 Appendix A.			
2	4. Initial emission testing shall be performed to determine compliance with CO, NMOC, and NOx emission limits contained in Table 2 herein for the enclosed flare. All emission testing shall be completed within 180 days from the date that the enclosed flare commences LFG burning.			
	5. The Permittee shall continuously monitor the operating temperature of the enclosed flare at a point near the flare exit.			

Table 3				
EU	Monitoring and Testing Requirements			
1, 2, and 3	6. The Permittee shall test/monitor the H <sub>2</sub> S concentration (ppmv) at the inlet of the Sulfa Treat air pollution control system at least once per week. The Permittee shall test/monitor the H <sub>2</sub> S concentration (ppmv) at the outlet of the Sulfa Treat air pollution control system at least five days per week except during weeks with a legal holiday. On these weeks, the Permittee shall test/monitor the H <sub>2</sub> S concentration at the outlet of the Sulfa Treat air pollution control system at least four days per week. MassDEP will consider changing the frequency of the testing/monitoring for H <sub>2</sub> S based upon a petition supporting a change in frequency. A written MassDEP approval will be required to change the frequency of testing/monitoring for H <sub>2</sub> S concentrations.			
	7. The Permittee shall monitor LFG flow to each device continuously.			
	8. The Permittee shall monitor the concentration of methane in the LFG on a daily basis.			
	9. Monitoring equipment or emission monitoring systems for the purpose of documenting compliance with this Plan Approval shall be installed, calibrated, maintained, and operated by the Permittee in sufficient manner to ensure continuous and accurate operations at all times.			
	<ol> <li>The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.</li> </ol>			
Facility- wide	11. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and MassDEP Regulation 310 CMR 7.13. MassDEP may require testing of any pollutants if deemed necessary to ascertain the mass emission rates and relationship to equipment design and operation. The Permittee shall conduct stack testing when the Department has determined that such stack testing is necessary to ascertain compliance with the MassDEP regulations or design approval provisions.			
	12. At least 30 days prior to emission testing, the Permittee shall submit to MassDEP for approval a stack emission pretest protocol.			
	13. Within 45 days after emission testing, the Permittee shall submit to MassDEP a final stack emission test results report.			

## Table 3 Key:

EU = Emission Unit Number LFG = landfill gas ppmv = parts per million by volume  $CO = Carbon \ Monoxide$   $NMOC = Non \ Methane \ Organic \ Compounds$   $NO_x = Nitrogen \ Oxides$  $H_2S = hydrogen \ sulfide$ 

Table 4			
EU	Record Keeping Requirements		
1, 2, and 3	The Permittee shall maintain hourly records of LFG flow to the generator set and the flares and shall summarize the monthly totals.		
	2. The Permittee shall maintain records of the hydrogen sulfide concentration measured at the inlet and outlet of the Sulfa Treat air pollution control system.		
	3. The Permittee shall maintain records of methane concentration of the landfill gas.		
	4. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in this Plan Approval. Records shall also include the actual emissions of air contaminants emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15 <sup>th</sup> day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at <a href="http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping">httml#WorkbookforReportingOn-SiteRecordKeeping</a> .		
	5. The Permittee shall maintain records of monitoring and testing as required by Table 3.		
	6. The Permittee shall maintain a copy of this Plan Approval, underlying Application, and the most up-to-date SOMP for the EUs and the Sulfa Treat system approved herein on-site.		
Facility- wide	7. The Permittee shall maintain a record of routine maintenance activities performed on the approved EUs, PCD, and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.		
	8. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EUs, the Sulfa Treat system, and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.		
	9. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.		
	10. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.		
	11. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request. Said response shall be transmitted on paper, on computer disk, or electronically at the discretion of MassDEP.		

## Table 4 Key:

EU = Emission Unit NumberLFG = landfill gas PCD = Pollution Control Device USEPA = United States Environmental Protection Agency SOMP = Standard Operating and Maintenance Procedure

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Table 5				
EU	Reporting Requirements			
2	The Permittee shall notify MassDEP within five (5) business days after the enclosed flare is installed and operational.			
Facility- wide	2. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).			
	3. The Permittee shall notify the Central Regional Office of MassDEP, BWP Permit Chief by telephone: 508-767-2845, email: <a href="mailto:CERO.Air@massmail.state.ma.us">CERO.Air@massmail.state.ma.us</a> , or fax: 508-792-7621, as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Permit Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).			
	4. The Permittee shall report annually to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.			

## Table 5 Key:

EU = Emission Unit Number

CMR = Code of Mass. Regulations

## 4. SPECIAL TERMS AND CONDITIONS

A. The Permittee is subject to, and shall comply with, the Special Terms and Conditions as contained in Table 6 below:

Table 6				
EU	Special Terms and Conditions			
	The engine shall reduce NMOC emissions by 98 percent by weight, or reduce the stack NMOC concentration to 20 parts per million as hexane by volume, dry basis at 3 percent oxygen, or less.			
	<ol> <li>The engine shall be constructed and operated in a manner that prevents noise that causes or contributes to a condition of air pollution. Such construction and operation shall include the following:</li> </ol>			
1	a. The engine shall have an exhaust silencer in good operating condition.			
	b. The engine shall be operated in a building which consists of an appropriate foundation, four walls and a roof. The walls and roof shall be made of solid material such as wood, metal, brick or concrete.			
	c. All doors on the access and exit passageways shall be kept closed at all times that they are not in use.			
	d. The walls, roof, doors, and windows and any ventilation openings for the building shall be acoustically treated as necessary.			
	3. The operating temperature setpoint for the enclosed flare shall be maintained in the range of 1600° to 1700°F.			
2 and 3	4. The Permittee shall operate the flares with a flame present at all times.			
	5. The enclosed flare shall have a propane pilot system for flame ignition and shall have a flame arrestor to prevent the flame from traveling back into the gas collection system. An ultraviolet flame detector or equivalent shall be used to detect the presence of a flame, both for the pilot system and the main flame.			
1, 2, and 3	6. The Permittee shall burn LFG primarily in the engine generator set and the enclosed flare. At times when the engine and enclosed flare are both operating, the LFG flow to the enclosed flare shall not exceed 1350 scfm. The open flare shall burn LFG only when the enclosed flare is temporarily malfunctioning, or when the flow rate of LFG to the enclosed flare falls below its lower operating limit of 370 scfm.			
	7. The LFG Treatment System shall be manufactured by Sulfa Treat or equivalent and designed to handle at least 1858 scfm of LFG.			
	8. The Sulfa Treat shall reduce LFG H <sub>2</sub> S concentration to a calendar monthly average of 200 ppmv with a maximum limit of 500 ppmv at 50 percent methane.			

Table 6				
EU	Special Terms and Conditions			
	9. The media in the Sulfa Treat vessels shall be replaced as needed to maintain the monthly average of 200 ppmv H <sub>2</sub> S. The contaminated regenerative media will be disposed of at the Facility in compliance with all applicable laws, regulations, approvals and permits.			
1, 2, and 3	10. The Sulfa Treat H <sub>2</sub> S air pollution control equipment may be removed and/or retired in place provided LFG samples for 12 consecutive months are 200 ppmv or less.			
	11. The engine and the flares shall be operated in a manner consistent with the manufacturer's specified operating and maintenance procedures at all times that the collected LFG is routed to the emission units.			
Facility- wide	12. This Plan Approval Transmittal No. X262787 supersedes and replaces all previous Air Quality Plan Approvals (Transmittal Nos. W068501, W068501-A1, and W068501-A2). The underlying application materials remain applicable where not superseded by this Plan Approval.			
	13. The Permittee shall maintain emergency back-up generators on-site at all times dedicated to flare operations in the event of a loss of power from the electrical grid that would otherwise prevent the use of the flare and ancillary equipment. The emergency generators shall comply with the requirements of 40 CFR 63 Subpart ZZZZ.			

#### Table 6 Key:

EU = Emission Unit Number LFG = landfill gas °F = Degrees Fahrenheit NMOC = Non Methane Organic Compounds ppmv = parts per million dry volume scfm = standard cubic feet per minute

B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including, but not limited to, rain protection devices known as "shanty caps" and "egg beaters."

C. The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU Stack Height Above Ground (feet)		Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1	22	1.0	144 - 265	836 - 984
2	45	9.0	5 - 35	1400 - 2000
3	28	0.67	50 - 82	1400 - 2000

#### Table 7 Key:

EU = Emission Unit Number

°F = Degree Fahrenheit

## 5. **GENERAL CONDITIONS**

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.

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- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

## 6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

## 7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

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Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Hui Liang at 508-767-2762, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Roseanna E. Stanley Acting Permit Chief Bureau of Waste Prevention

#### Enclosure

ecc: Southbridge Board of Health

Southbridge Fire Department Charlton Health Department Charlton Fire Department

Town of Southbridge, 41 Elm Street, Southbridge, MA 01550 Attn: Town Manager

MassDEP/Boston - Yi Tian

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Sanborn Head & Associates